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POLICY STATEMENT 1-01

From: Commander To: Distribution

Subj: CONTROL OF RADIOACTIVE MATERIAL DURING DEPOT LEVEL MAINTENANCE

Ref: (a) Radiological Affairs Support Program Manual, NAVSEA SO420-AA-RAD-010 (RAD-IO)

- (b) Marine Corps Order, MCO 5104.3A
- 1. Purpose. This directive provides control and accountability requirements for radioactive material (RAM) during depot level maintenance processes.
- 2. Background. Authority is derived from references (a) and (b), and Naval Radioactive Materials

Permits (NRMP) 10-67004-TI NP, 10-67004-T2NP, 10-67004-T3NP issued to Commander MARCORLOGBASES.

3. . MARCORLOGBASES maintenance facilities shall implement and utilize sound

radiological work practices and procedures to account for and control RAM contained in equipment

that has been inducted into the maintenance process.

- 4. Responsibilities
- a. The Logistics Radiation Safety Officer (LRSO). The LRSO is the director of the Marine

Corps Radiological Controls Office (RCO) and can be reached at DSN 567-5511, or commercially at

(229) 639-5511. The LRSO is appointed by COMMARCORLOGBASES and is

directly responsible

for oversight of all Marine Corps activities involving radioactive materials and radiation producing

machines. The LRSO shall:

(1) In conjunction with Inventory Managers, maintain a current inventory of all RAM

possessed by MARCORLOGBASES maintenance facilities and the Marine Corps in accordance

with NRMP requirements.

- (2) Review and approve all procedures related to radiation safety and the control of RAM during maintenance processes.
- (3) Approve maintenance procedures for all equipment containing RAM prior to receipt at the repair facility.
- (4) Pre-approve the acquisition and purchase of all equipment containing RAM.
- (5) Perform semi-annual audits of RAM equipment maintenance processes.
- (6) Maintain records of audit results for 3 years in accordance with 10 CFR 30 and RAD-010.
- b. Commanding Officers shall implement local procedures and administrative controls as

necessary to ensure safe radiological operations during all phases of maintenance, including

procedures to provide positive control of the procurement, use, and disposal of radioactive material.

Administrative controls shall include procedures to verify maintenance personnel only receive

radioactive materials in the types and quantities for which they are authorized.

c. MARCORLOGBASES (Code 836) Inventory Managers shall:

(1) Inventory managers can be contacted through the MARCORLOGBASES Life Cycle

Management Center (LCMC) office at DSN 567-6471, or commercially at (229) 639-6471.

- (2) I ssue disposition instructions to end-users and maintenance facility codes designated to receive equipment, including receipt for disposal, in accordance with applicable licenses/pennits and supply instructions.
- (3) Maintain records of disposition instructions issued for 3 years in accordance with 10 CFR 30 and RAD-010.
- (4) Prior to releasing commercial contracts for bidding, obtain LRSO approval for those contracts providing for repair, refurbishment, or rebuilding of RAM, equipment/devices containing RAM, or machine sources of ionizing radiation.
- (5) Obtain aproval from the LRSO prior to acquiring, purchasing, or fielding new,or additional RAM, equipment/devices containing RAM, or machine sources of ionizing radiation.
- (6) Report to the LRSO all changes to radioactive material inventories, including changes to individually serialized subassemblies, such as Chemical Agent Monitor drift tube modules. contained within serialized principle end items.
- d. Installation Radiation Safety Officers (IRSO) shall:
- (1) Submit to the LRSO for review and approval, all site-specific instructions, procedures, and local orders developed to account for and control the use of RAM in accordance with references
- (a) and (b), and applicable NRMP's.

(2) Maintain a Current and accurate inventory of all radioactive materials in storage and use,

including low-level radioactive waste (LLRW).

- (3) Documented inventories shall include:
- (a) I tem description (i.e., M1A1 Collimator)
- (b) Serial number(s)
- (c) NSN
- (d) I sotope (i.e., H-3, Ni-63, etc.)
- (e) Activity of the source
- (f) Chemical and physical form of the RAM contained in the item
- (g) Date of activity determination (if unknown, provide date ofpurchase, date of

receipt, or date when initially placed into USMC service)

- (h) Location
- (i) Custodian name (including contact information)
- (j) Owning unit
- (k) Unit RUC/AAC
- (4) Report the results of the inventory to the LRSO semi-annually, not later than 30 March and 30 September of each year.
- (5) Maintain records of inventories for 5 years in accordance with NRMP requirements.
- (6) Provide radiation safety oversight for all maintenance operations performed on equipment containing RAM and radiation producing machines.

- (7) Maintain a centralized LLRW storage facility for use by the installation and its tenants.
- (a) Maintain records of disposition instructions for 3 years in accordance with

10 CFR 30 and RAD-010.

(b) Dispose of LLRW in accordance with the requirements of Department of Defense

Instruction 4715.6-R, NAVSEADET RASO, and the LRSO.

(c) Coordinate requests for pickup and disposal of LLRW through NA VSEADET

RASO via the LRSO and the Radiological Controls Office.

- (8) Audit installation and tenant radiation safety programs in accordance with reference (a).
- (a) Document and maintain audit results for 3 years in accordance with 10 CFR 30 and RAD-010.
- (b) Notify the LRSO of all noncompliance issues related to licensed or pemlitted activities within two days of its discovery.
- (c) Provide a written corrective action report for issues requiring more than one day to correct.
- e. Maintenance Center Managers shall audit RAM equipment maintenance processes to ensure compliance with established radiation safety procedures and policies.
- (1) Document and maintain audit results for 3 years after the completion of the audit in accordance with 10 CFR 30 and RAD-010.
- (2) Notify the IRSO of all noncompliance issues related to licensed or

permitted activities within two days of its discovery .

- (3) Provide a written corrective action report for issues requiring more than one day to correct.
- (4) Maintain records of disposition instructions for 3 years in accordance with

10 CFR 30 and RAD-010.

- f. Maintenance personnel shall:
- (1) Comply with established policies and procedures for the control and safe use of RAM equipment during maintenance.
- (2) Obtain IRSO approval prior to accepting receipt or submitting requisitions for any RAM, equipment containing RAM, or machine sources of ionizing radiation.
- 5. Applicability. This Policy is applicable to all installations and commands that are components of Marine Corps Logistics Bases.

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